

orig.

KARDARAS & KELLEHER LLP
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 Attorneys for Defendant
 SHENZHEN HIGH POWER
 TECHNOLOGY CO. LTD.

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

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ENERGIZER S.A., :

Plaintiff, :

07 CV 7406 (LTS)

Against :

ECF CASE

M/V YM GREEN her engines, boilers and :
 Tackle *in rem*; YANG MING MARINE :
 TRANSPORT CORP.; YANGMING (UK) LTD.; :
 ALL OCEANS TRANSPORTATION INC.; :
 KAWASAKI KISEN KAISHA LTD.; CONTERM :
 HONG KONG LTD.; VANGUARD LOGISTICS :
 SERVICES HONG KONG LTD.; :
 FIEGE GOTH CO., LTD.; and SHENZHEN :
 HIGH POWER TECHNOLOGY CO. LTD. :

**ANSWER TO PLAINTIFF'S
 CLAIM FOR INDEMNITY AND
 CONTRIBUTION**

Defendants. :

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Defendant SHENZHEN HIGH POWER TECHNOLOGY CO. LTD. ("High Power"), by its attorneys Kardaras & Kelleher LLP, as and for its answer to plaintiff's claim for indemnity and contribution contained in plaintiff's reply dated March 10, 2008 to counterclaim of defendant All Oceans Transportation Inc., alleges upon information and belief as follows:

1. Denies the allegations contained in paragraph 12 of plaintiff's claim for indemnity and contribution.

2. Denies having knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 13 plaintiff's claim for indemnity and contribution and otherwise leaves the plaintiff to its proof and refers all questions of law to the court.

3. Denies the allegations contained in paragraph 14 of plaintiff's claim for indemnity and contribution as to Defendant SHENZHEN HIGH POWER TECHNOLOGY CO. LTD. but otherwise denies having knowledge and information sufficient to form a belief as to the truth of the allegations as to any other party.

4 Denies having knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 15 plaintiff's claim for indemnity and contribution and otherwise leaves the plaintiff to its proof and refers all questions of law to the court.

5. Denies having knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 16 plaintiff's claim for indemnity and contribution and otherwise leaves the plaintiff to its proof and refers all questions of law to the court.

6. Denies the allegations contained in paragraph 17 of plaintiff's claim for indemnity and contribution as to Defendant SHENZHEN HIGH POWER TECHNOLOGY CO. LTD. but otherwise denies having knowledge and information sufficient to form a belief as to the truth of the allegations as to any other party.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

7. Defendant SHENZHEN HIGH POWER TECHNOLOGY CO. LTD. claims the benefit of all defenses raised by co-defendants and plaintiff in its response to cross-claims and counterclaims as well as its defenses set forth in its answer to plaintiff's complaint, as if set forth fully and specifically herein and incorporated herein by reference, raised insofar as said defenses may be applicable to defendant High Power.

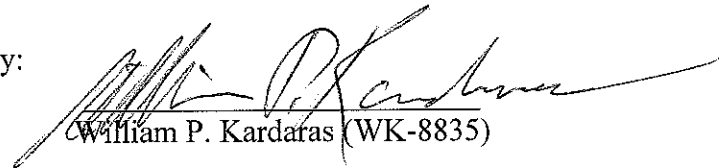
WHEREFORE, Defendant High Power prays that plaintiff's claim for indemnity and contribution be dismissed with prejudice, together with costs, disbursements and attorney's fees and for such other and additional relief as to the Court may seem just and proper.

Dated: New York, NY
August 5, 2008

Respectfully submitted,

KARDARAS & KELLEHER, LLP
44 Wall Street
New York, NY 10005
Attorneys for Defendant
SHENZHEN HIGH POWER
TECHNOLOGY CO. LTD.

By:



William P. Kardaras (WK-8835)

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CERTIFICATE OF SERVICE BY REGULAR U.S. MAIL AND BY ECF

The undersigned declares under penalty of perjury that the following is true and correct:

1. I am over the age of eighteen years and I am not a party to this action.
2. On August 5, 2008, I served a complete copy of SHENZHEN HIGH POWER TECHNOLOGY CO. LTD.'s Answer to Plaintiff's Claim for Indemnity and Contribution by regular U.S. mail and/or by ECF, to the following attorneys at their respective ECF registered address and/or at the following address:

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Dated: New York, New York
August 5, 2008

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